

The Honorable MARSHA J. PECHMAN

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

A.B., by and through her next friend
CASSIE CORDELL TRUEBLOOD, et al.,

Plaintiffs,

v.

WASHINGTON STATE DEPARTMENT
OF SOCIAL AND HEALTH SERVICES,
et al.,

Defendants.

NO. 2:14-cv-1178 MJP

DEFENDANT'S EXHIBIT LIST RE:
EVIDENTIARY HEARING
BEGINNING JUNE 12, 2023

Defendant Washington State Department of Social and Health Services hereby submits
the following list of exhibits to be used at the Evidentiary Hearing beginning June 12, 2023.

No.	Description	Admissibility Stipulated	Authenticity Stipulated / Admissibility Disputed	Authenticity & Admissibility Disputed
101	State Hospital and RTF Average Daily Census – June 2023 – Exhibit A to Updated Stipulation	X		

No.	Description	Admissibility Stipulated	Authenticity Stipulated / Admissibility Disputed	Authenticity & Admissibility Disputed
102	Forecasts of Forensic and Civil Bed Need for WSH and ESH – June 2023 - Exhibit B to Updated Stipulation	X		
103	BHA Historical Funded Beds – June, 3 2022 - Exhibit C to Updated Stipulation	X		
104	Competency Evaluation Clients – 2018 to 2022 – Exhibit D to Updated Stipulation	X		
105	HCA Data Regarding Beds – Exhibit E to Updated Stipulation	X		
106	Competency Outcome Determinations – January 2023 – Exhibit F to Updated Stipulation	X		
107	Contempt Hearings, Outcomes, and Fines – Exhibit G to Updated Stipulation	X		
108	Most Serious Charge Waitlist – January 5, 2023 – Exhibit H to Updated Stipulation	X		
109	Phase 1 Implementation Plan – Docket #945-1	X		

No.	Description	Admissibility Stipulated	Authenticity Stipulated / Admissibility Disputed	Authenticity & Admissibility Disputed
110	Phase 2 Implementation Plan – Docket #945-2	X		
111	BHA Pro 10.01 Algorithm Work Instructions for Adult Forensic Admissions – April 26, 2021			
112	Dismissal Priority Review – March 2023			
113	Felony Conversion (“Felony Flip”) Process Flow Chart			
114	Monthly Report to Court Monitor – May 2023			
115	Phase 3 Preliminary Implementation Plan – Docket #990-1 at 25-63			
116	Recent DSHS BHA Investments and Initiatives to Address Staffing			
117	Agreed Proposal as to Implementation of Phase Three – Docket #942-1			
118	BHA Bed Capacity Strategies			
119	Outpatient Competency Restoration Program – Appendix B – 2022 Q4			

120	Forensic Housing and Recovery Through Peer Services – Appendix E – 2022 Q4			
121	Forensics Projects for Assistance in Transition from Homelessness – Appendix F – 2022 Q4			
122	Keri Waterland Resume February 2023			
123	Behavioral Health Highlighted Investments Since FY 2019 – Docket #946-1			
124	New Long Term Civil Commitment Investments Since FY 19 – Docket # 946-2			
125	Investments in Community Based Facilities Since FY 19 – Docket # 946-3			
126	Investments in Community Support & Treatment Since FY 19 – Docket # 946-4			
127	Investments in Housing Support Services Since FY 19 – Docket # 946-5			
128	Spokane Regional Stabilization Center Report - 2022			
129	Stipulation Regarding Evidence Hearing – Docket # 992			

130	Dr. George Petzinger Resume			
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RESPECTFULLY SUBMITTED this 9th day of June, 2023.

s/ Marko L. Pavela

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CERTIFICATE OF SERVICE

I, *Christine Townsend*, state and declare as follows:

I am a citizen of the United States of America and over the age of 18 years and I am competent to testify to the matters set forth herein. I hereby certify that on this 9th day of June 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

David Carlson: davide@dr-wa.org

Kimberly Mosolf: kimberlym@dr-wa.org

Elizabeth Leonard: bethl@dr-wa.org

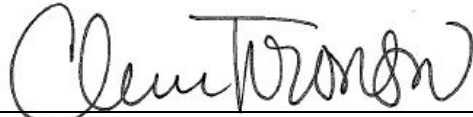
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David JW Hackett: david.hackett@kingcounty.gov

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 9th day of June 2023, at McCleary, Washington.



CHRISTINE TOWNSEND
Legal Assistant